

**NORMA A. AGUILAR**  
 Federal Defenders of San Diego, Inc.  
 California State Bar No. 211088  
 225 Broadway, Suite 900  
 San Diego, CA 92101-5030  
 (619) 234-8467/Fax: (619) 687-2666  
 E-Mail: norma\_aguilar@fd.org  
 Attorneys for Ms.. Lacey Desiree Espinoza

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA  
 (HONORABLE M. JAMES LORENZ)

UNITED STATES OF AMERICA,	)	CASE NO. 08CR0794-MJL
	)	
Plaintiff,	)	DATE: APRIL 21, 2008
	)	TIME: 2:00 P.M.
v.	)	
	)	NOTICE OF MOTIONS AND MOTIONS
LACEY DESIREE ESPINOZA,	)	TO:
	)	
Defendant.	)	(1) DISMISS THE INDICTMENT FOR
	)	GRAND JURY VIOLATION;
	)	(2) SUPPRESS STATEMENTS;
	)	(3) COMPEL DISCOVERY/PRESERVE
	)	EVIDENCE; AND
	)	(4) GRANT LEAVE TO FILE FURTHER
	)	MOTIONS

TO: KAREN HEWITT, UNITED STATES ATTORNEY, AND  
 DALE BLANKENSHIP, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on April 21, 2008 at 2:00 p.m., or as soon thereafter as  
 counsel may be heard, defendant, Lacey Desiree Espinoza, by and through her attorneys, Norma  
 A. Aguilar and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting  
 the following motions.

**MOTIONS**

Defendant, Lacey Desiree Espinoza, by and through her attorney, Norma A. Aguilar and Federal Defenders of San Diego Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Dismiss the Indictment for Grand Jury Violation;
- (2) Suppress Statements;
- (3) Compel Discovery/Preserve Evidence; and
- (4) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: April 7, 2008

/s/ Norma A. Aguilar  
**NORMA A. AGUILAR**  
Attorney for Ms. Espinoza  
norma\_aguilar@fd.org